

Eric H. Gibbs (SBN 178658)
Andre Mura (SBN 298541)
Steve Lopez (SBN 300540)
GIBBS LAW GROUP LLP
505 14th Street, Suite 1110
Oakland, California 94612
Telephone: (510) 350-9700
Facsimile: (510) 350-9701
ehg@classlawgroup.com
amm@classlawgroup.com
sal@classlawgroup.com

Scott Silver (*pro hac vice* to be submitted)
SILVER LAW GROUP
11780 W. Sample Road
Coral Springs, FL 33065
Telephone: (954) 755-4799
Facsimile: (954) 755-4684
ssilver@silverlaw.com

Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

BRYAN METZLER, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

ROBINHOOD FINANCIAL LLC,
ROBINHOOD SECURITIES, LLC, and
ROBINHOOD MARKETS, INC.,

Defendants.

Case No. _____

**DECLARATION OF PLAINTIFF'S
COUNSEL PURSUANT TO
CALIFORNIA CIVIL CODE
SECTION 1780(d)**

1 I, Eric H. Gibbs declare as follows:

2 1. I am a partner with Gibbs Law Group LLP, counsel for Plaintiff in this action. I
3 have personal knowledge of the facts stated herein and, if called upon to do so, could and
4 would testify competently thereto.

5 2. I submit this declaration on behalf of Plaintiff and in support of Plaintiff's Class
6 Action Complaint, which is based in part on violations of the Consumers Legal Remedies
7 Act, California Civil Code § 1750, et seq.

8 3. Plaintiff's Class Action Complaint has been filed in the proper place for trial of
9 this action, which is the U.S. District Court for the Northern District of California.
10 Defendants all reside and do business in this district. Moreover, because Defendants are
11 headquartered in this District and have their principal place of business in this District, a
12 substantial number of the events or omissions giving rise to Plaintiff's claims occurred in this
13 District.

14
15 I declare under penalty of perjury that the foregoing is true and correct.
16 Executed on April 3, 2020 in Oakland, California.

17
18 /s/ Eric H. Gibbs

19 Eric H. Gibbs
20
21
22
23
24
25
26
27
28